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DOCKETS
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DAVID TUBMAN

From: WDONTWACA@aol.com
Sent: Saturday, September 18, 1999 9:20 PM
To: LNG@d1 meba.org
Subject: MARAD letter re: LNG reflagging

Date: 17 September 1999
To: The Honorable Clyde Hart
Maritime Administrator
From: William W. Donnini, Sr.
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SUBJECT: DOCKET NO. MARAD-1999-6171 - 357

This writing is in reference to the reflagging of 8 AMERICAN liquefied natural gas tankers that were formerly operated by Energy Transportation Corporation and now operated by Pronav Ship Management of Greenwich, Connecticut. This reflagging would directly affect the livelihood, families and careers of close to 200 licensed merchant marine officers. Presently all 8 ships have their reflagging applications submitted to MARAD.

These 8 LNG carriers are very sophisticated vessels and the thought of transferring operations to a "flag of convenience" mystifies those of us who have been operating these ships for 20 years. It is not even imaginable that the experienced officers of MEBA (Marine Engineers Beneficial Association) would be replaced by inexperienced personnel from AMO (American Maritime Officers). We in MEBA know there is no conceivable way that Pronav and AMO could provide the required experienced and certified personnel.

SAFETY is the most important concept when operating these vessels and the very thought of inexperience manning these ships is frightening.

If "flags of convenience" are allowed to take over these 8 vessels, what kind of message is being sent to 200 AMERICAN licensed MEBA union members whose very existence depends on these 8 ships remaining under the American flag and under the operation of experienced personnel.

This letter requests that the reflagging of the 8 LNG vessels be denied and the proven, reliable marine officers from MEBA remain as the operators of these vessels.

Respectfully submitted,

William W. Donnini, Sr.
Chief Engineer
LNG CAPRICORN